

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW HAMPSHIRE**

In Re: Lon E. Meneer

Debtor(s)

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Case No.: 03-13885-MWV
CHAPTER 13

**DEBTOR'S MOTION
FOR
AUTHORIZATION TO SELL PERSONAL RESIDENCE**

NOW COMES the Debtor in the above-captioned matter, Lon E. Meneer, by and through his Attorneys, Raymond J. DiLucci, P.A. and Respectfully Requests that this Honorable Court Grant to the Debtor Authorization to Sell his Personal Residence and in support thereof says:

1. That the Debtor has a fully executed Purchase and Sales Agreement to sell his Personal Residence for the sum of \$267,000.00. (See Exhibit A)
2. That all contingencies, affecting the Transfer of Title, have been met.
3. That the Debtor's Plan of Reorganization has not yet been confirmed but the confirmation hearing is now scheduled for September 17, 2004 at 9:00 A.M.
4. That the Transfer of Title is currently scheduled for June 29, 2004, except that the Debtor must have authorization to sell the subject property from this Court.
5. That pursuant to the sale of the property, the Mortgage and the Real Estate taxes encumbering the property will be paid in full.
6. That any non-exempt proceeds from the sale of the Debtor's personal residence will be utilized to fund the Debtor's Chapter 13 Plan of Reorganization.
7. That neither party to this transaction is represented by a Real Estate Broker.

WHEREFORE, the Debtors Respectfully Requests that this Honorable Court:

- A. Grant the Debtor Authorization to sell his Personal Residence; and
- B. For such other and further relief as is deemed fair, just and equitable.

Respectfully submitted,
Lon E. Meneer
By and through his Attorneys,

Dated: May 25, 2004

/s/ Raymond J. DiLucci
Raymond J. DiLucci, Esquire

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